

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**  
Reading Division

Michael Tacetta and Linda Marie  
Taccetta,

*Debtors.*

Chapter 13  
Case No. 23-11009-pmm

**Motion to Modify Plan After Confirmation**


Debtors Michael Tacetta and Linda Marie Taccetta, through her attorney, moves this Court as follows:

1. The Debtor filed a bankruptcy petition in the Middle District of Pennsylvania on April 3, 2023. The case was transferred interdistrict on April 6, 2023. The plan was confirmed on May 16, 2024.
2. The New York State Department of Taxation and Finance ("NYSDTF") recently amended their claim to \$1,137.00, which is a \$549 increase over their original claim.
3. The Debtors wish to modify their plan to correct the unpaid attorney fees on §2(e)(A)(1) to the amount awarded by the court, correct the amount on §2(e)(A)(3) and §3(a) to reflect the \$549 increase in the NYSDTF's claim, correct the Subtotal, correct the estimated trustee's commission on §2(e)(E) and base plan amount on §2(e)(F) to conform to the new Subtotal, and lower the monthly payment amount.
4. The Debtor requests that the Court enter an order approving the plan filed at ECF No. 66 as the new confirmed plan.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: November 27, 2024

CIBIK LAW, P.C.  
*Counsel for Debtor*

By:   
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